

**UNITED STATES BANKRUPTCY COURT WESTERN
DISTRICT OF PENNSYLVANIA
DISTRICT OF PITTSBURGH**

**IN RE: Renee R. Kline,
Debtors.**

**CASE NO.: 20-20081-JAD
Chapter 13**

RESPONSE TO INTERIM NOTICE OF CURE OF ARREARS
(Docket No. 73)

NOW INTO COURT, through undersigned counsel, comes secured creditor, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust (“Secured Creditor”), and files its response to the Interim Notice of Cure of Arrears (Docket No. 73), and in support thereof, represents the following:

1. Secured Creditor agrees the Trustee has disbursed pre-petition arrears.
2. Secured Creditor disagrees the Debtor is current post-petition. Account is due for 05/01/2024 with a post-petition payment of \$493.04 minus a suspense balance of \$122.86 with \$370.18 due. Please note, Secured Creditor is not in receipt of check #1299480 in the amount of \$493.04 dated 04/25/2024. Once received the funds will be applied to the account.
3. Secured Creditor reserves the right to amend its Response to the Interim Notice of Cure of Arrears.

DATED: May 3, 2024

Respectfully submitted by,
/s/ Michelle L. McGowan
Michelle McGowan, Esq.
**Robertson, Anschutz, Schneid, Crane & Partners,
PLLC**
13010 Morris Rd., Suite 450, Alpharetta, GA 30004
**Attorney for Wilmington Savings Fund Society,
FSB, d/b/a Christiana Trust, not individually but
as trustee for Pretium Mortgage Acquisition Trust**

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 3, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Renee R. Kline
2109 Victoria Avenue
Arnold, PA 15068

And via electronic mail to:

Rodney D. Shepherd
River Park Commons
2403 Sidney Street, Suite 208
Pittsburgh, PA 15203

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

By: /s/ Justine Bennett
Justine Bennett
Email: Jusbennett@raslg.com

PAYMENT HISTORY

PAYMENT HISTORY PER MSP									
LOAN NUMBER			POST-PETITION						
FILING DATE			PAYMENT CHANGES						
PAYMENTS IN POC			EFFECTIVE	2/1/2020	12/1/2021	1/1/2023	11/1/2023		
FIRST POST-PETITION DUE DATE			AMOUNT	\$ 457.71	\$ 530.62	\$ 483.56	\$493.04		
INCOMING FUNDS			MANUAL HISTORY					COMMENTS	
DATE	PRE-PETITION FUNDS	POST-PETITION FUNDS	PAYMENT AMOUNT	Phonepay Fee	MANUAL SUSP	MANUAL SUSP BAL	MANUAL POST PYMT	COMMENTS	
STARTING BALANCES				\$ -	\$ -	\$ -			
1/15/2020				\$ -	\$ -	\$ -			
3/26/2020				\$ -	\$ -	\$ -			
3/26/2020				\$ -	\$ -	\$ -			
3/28/2020				\$ -	\$ -	\$ -			
7/2/2020		\$ 993.82	\$457.71	\$ -	\$ 536.11	\$ 536.11	2/1/2020		
8/5/2020		\$ 357.48	\$457.71	\$ -	\$ (100.23)	\$ 435.88	3/1/2020		
9/1/2020		\$ 379.50	\$457.71	\$ -	\$ (78.21)	\$ 357.67	4/1/2020		
9/28/2020				\$ -	\$ -	\$ 357.67			
10/2/2020		\$ 492.72	\$457.71	\$ -	\$ 35.01	\$ 392.68	5/1/2020		
10/21/2020				\$ -	\$ -	\$ 392.68			
10/21/2020				\$ -	\$ -	\$ 392.68			
10/21/2020				\$ -	\$ -	\$ 392.68			
11/2/2020		\$ 537.09	\$457.71	\$ -	\$ 79.38	\$ 472.06	6/1/2020		
11/2/2020				\$ -	\$ -	\$ 472.06			
12/15/2020		\$ 589.50	\$457.71	\$ -	\$ 131.79	\$ 603.85	7/1/2020		
1/6/2021		\$ 633.06	\$457.71	\$ -	\$ 175.35	\$ 779.20	8/1/2020		
2/1/2021		\$ 675.83	\$457.71	\$ -	\$ 218.12	\$ 997.32	9/1/2020		
2/1/2021			\$457.71	\$ -	\$ (457.71)	\$ 539.61	10/1/2020		
3/3/2021		\$ 717.67	\$457.71	\$ -	\$ 259.96	\$ 799.57	11/1/2020		
3/30/2021		\$ 758.39	\$457.71	\$ -	\$ 300.68	\$ 1,100.25	12/1/2020		
3/30/2021			\$457.71	\$ -	\$ (457.71)	\$ 642.54	1/1/2021		
4/8/2021			\$457.71	\$ -	\$ (457.71)	\$ 184.83	2/1/2021		
4/8/2021				\$ -	\$ -	\$ 184.83			
4/28/2021				\$ -	\$ -	\$ 184.83			
5/4/2021		\$ 797.66	\$457.71	\$ -	\$ 339.95	\$ 524.78	3/1/2021		
5/4/2021				\$ -	\$ -	\$ 524.78			
6/3/2021		\$ 834.91	\$457.71	\$ -	\$ 377.20	\$ 901.98	4/1/2021		
6/29/2021		\$ 471.15	\$457.71	\$ -	\$ 13.44	\$ 915.42	5/1/2021		
6/29/2021			\$457.71	\$ -	\$ (457.71)	\$ 457.71	6/1/2021		
7/29/2021		\$ 457.71	\$457.71	\$ -	\$ -	\$ 457.71	7/1/2021		
8/30/2021		\$ 457.71	\$457.71	\$ -	\$ -	\$ 457.71	8/1/2021		
9/22/2021			\$457.71	\$ -	\$ (457.71)	\$ 0.00	9/1/2021		
9/30/2021	\$ 135.31	\$ 457.71	\$457.71	\$ -	\$ -	\$ 0.00	10/1/2021		
10/29/2021	\$ 201.75	\$ 457.71	\$457.71	\$ -	\$ -	\$ 0.00	11/1/2021		
11/30/2021	\$ 161.52	\$ 530.62	\$530.62	\$ -	\$ -	\$ 0.00	12/1/2021		
12/29/2021	\$ 160.76	\$ 530.62	\$530.62	\$ -	\$ -	\$ 0.00	1/1/2022		
1/4/2022				\$ -	\$ -	\$ 0.00			
2/7/2022	\$ 191.92	\$ 530.62	\$530.62	\$ -	\$ -	\$ 0.00	2/1/2022		
3/1/2022	\$ 191.01	\$ 530.62	\$530.62	\$ -	\$ -	\$ 0.00	3/1/2022		
3/31/2022	\$ 190.11	\$ 530.62	\$530.62	\$ -	\$ -	\$ 0.00	4/1/2022		
4/4/2022				\$ -	\$ -	\$ 0.00			
4/8/2022				\$ -	\$ -	\$ 0.00			
4/8/2022				\$ -	\$ -	\$ 0.00			
4/8/2022				\$ -	\$ -	\$ 0.00			
6/13/2022		\$ 948.12	\$530.62	\$ -	\$ 417.50	\$ 417.50	5/1/2022		
6/13/2022				\$ -	\$ -	\$ 417.50			
7/14/2022	\$ 88.99	\$ 643.74	\$530.62	\$ -	\$ 113.12	\$ 530.62	6/1/2022		
7/30/2022	\$ 188.27	\$ 530.62	\$490.41	\$ -	\$ 40.21	\$ 570.83	7/1/2022	As per SOR - lesser value	
9/6/2022	\$ 187.37	\$ 530.62	\$530.62	\$ -	\$ -	\$ 570.83	8/1/2022		
9/6/2022			\$530.62	\$ -	\$ (530.62)	\$ 40.21	9/1/2022		
9/6/2022				\$ -	\$ -	\$ 40.21			

CURRENT TOTALS

Pre Pmts	Post Pmts	Susp Bal
\$6,944.97	\$24,761.52	\$1,409.65

